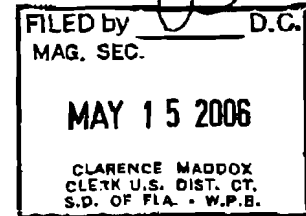


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No.: 06-80070-Cr-MIDDLEBROOKS/JOHNSON(s)

21 USC 841(a)(1)
21 USC 846
21 USC 841(b)(1)(A)
21 USC 841(b)(1)(B)
21 USC 841(b)(1)(C)
18 USC 922(g)(1)
18 USC 924(a)(2)
18 USC 2



UNITED STATES OF AMERICA,

v.

WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy,"
CARLTON POTTS, a/k/a "Pep,"
LEONARD ALLEN, JR., a/k/a "Little Dred,"
DINESA DRIGO,
ANTHONY GREEN, a/k/a "Rocco,"
MICHAEL DRAYTON, a/k/a "Mike Allen," a/k/a "Mike Mike,"
RICKIE ZEIGLER, JR., a/k/a "Man,"
RICHARD SMALL, a/k/a "Frank Wilson," a/k/a "Big Nick,"
JEFFERY POTTS,
APRIL JACKSON,
LEVESTER PHILLIPS, a/k/a "Tanker,"
HENRY MCNISH, a/k/a "Nish,"
DEMETRIUS MCFADDEN,
KENDRICK HUGHES,
DONDRELL MILLER, a/k/a "Midnight,"
MAURICE DAVIS, a/k/a "Mo,"
GREGORY THELUMSA,
CHEDRICK STONE,
NICKY SAMUELS,
JIMMIE BRINSON,
RONALD GAMBLE,
NORMAN THOMAS, and
RICKY BRINSON,

Defendants.

SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT 1

From a time unknown to the Grand Jury but believed to be as early as January 30, 2006, to on or about February 28, 2006, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

**WINFRED LORENZO, a/k/a "Big Dred," a/k/a "Fatboy,"
CARLTON POTTS, a/k/a "Pep,"
LEONARD ALLEN, JR., a/k/a "Little Dred,"
DINESA DRIGO,
ANTHONY GREEN, a/k/a "Rocco,"
MICHAEL DRAYTON, a/k/a "Mike Allen," a/k/a "Mike Mike,"
RICKIE ZEIGLER, JR., a/k/a "Man,"
RICHARD SMALL, a/k/a "Frank Wilson," a/k/a "Big Nick,"
JEFFERY POTTS, and
APRIL JACKSON,**

did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons unknown to the Grand Jury to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1), all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(A), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 50 grams.

COUNT 2

On or about January 30, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and

DEMETRIUS MCFADDEN,

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 3

On or about January 31, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
DEMETRIUS MCFADDEN,**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 4

On or about January 31, 2006, in Palm Beach County, in the Southern District of Florida, the

defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
LEVESTER PHILLIPS, a/k/a "Tanker,"**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 5

On or about February 1, 2006, in Palm Beach County, in the Southern District of Florida,
the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
DEMETRIUS MCFADDEN,**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 6

On or about February 2, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
LEVESTER PHILLIPS, a/k/a "Tanker,"**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 7

On or about February 2, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
GREGORY THELUMSA,**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of

cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 8

On or about February 3, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
JIMMIE BRINSON,**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 9

On or about February 3, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
HENRY MCNISH, a/k/a "Nish,"**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine

base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 10

On or about February 4, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
KENDRICK HUGHES,**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine.

COUNT 11

On or about February 4, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy,"

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine

COUNT 12

On or about February 5, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
GREGORY THELUMSA,**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 13

On or about February 6, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy,"
JIMMIE BRINSON, and
ANTHONY GREEN, a/k/a "Rocco,"**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine.

COUNT 14

On or about February 7, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
RONALD GAMBLE,**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 15

On or about February 7, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy,"

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 16

On or about February 8, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
RICHARD SMALL, a/k/a Frank Wilson, a/k/a "Big Nick,"**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 17

On or about February 9, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy,"
NICKY SAMUELS, and
ANTHONY GREEN, a/k/a "Rocco,"**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine.

COUNT 18

On or about February 9, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
GREGORY THELUMSA,**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 19

On or about February 10, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
DONDRELL MILLER, a/k/a "Midnight,"**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of

cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 20

On or about February 10, 2006, in Palm Beach County, in the Southern District of Florida,
the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
MICHAEL DRAYTON, a/k/a "Mike Allen," a/k/a "Mike Mike,"**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance,
a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code,
Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the
controlled substance was in fact a mixture and substance containing a detectable amount of cocaine
base, commonly known as crack cocaine, and that the amount containing a detectable amount of
cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 21

On or about February 14, 2006, in Palm Beach County, in the Southern District of Florida, the
defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy,"
MICHAEL DRAYTON, a/k/a "Mike Allen," a/k/a "Mike Mike," and
RICHARD SMALL, a/k/a "Frank Wilson," a/k/a "Big Nick,"**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance,
a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code,
Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that the
controlled substance was in fact a mixture and substance containing a detectable amount of cocaine

base, commonly known as crack cocaine.

COUNT 22

On or about February 15, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
LEVESTER PHILLIPS, a/k/a "Tanker,"**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 23

On or about February 15, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
KENDRICK HUGHES,**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine

base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 24

On or about February 16, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy,"
LEONARD ALLEN, JR., a/k/a "Little Dred," and
RICKIE ZIEGLER, a/k/a "Man,"**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(A), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 50 grams.

COUNT 25

On or about February 18, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
LEVESTER PHILLIPS, a/k/a "Tanker,"**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the

controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 26

On or about February 24, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
MAURICE DAVIS, a/k/a "MO,"**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 27

On or about February 25, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
CHEDRICK STONE,**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 28

On or about February 26, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
LEVESTER PHILLIPS, a/k/a "Tanker,"**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 29

On or about February 27, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy," and
MAURICE DAVIS, a/k/a "Mo,"**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code,

Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, and that the amount containing a detectable amount of cocaine base, commonly known as crack cocaine, was at least 5 grams.

COUNT 30

From a time unknown to the Grand Jury but believed to be as early as January 31, 2006, to on or about February 14, 2006, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy,"
CARLTON POTTS, a/k/a "Pep," and
NORMAN THOMAS,**

did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons unknown to the Grand Jury to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1), all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine, and that the amount containing a detectable amount of cocaine was at least 500 grams.

COUNT 31

On or about January 31, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy,"
CARLTON POTTS, a/k/a "Pep," and**

NORMAN THOMAS,

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1) (C) it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine.

COUNT 32

On or about February 4, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy,"
CARLTON POTTS, a/k/a "Pep," and
NORMAN THOMAS,**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1) (C) it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine.

COUNT 33

On or about February 14, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy,"
CARLTON POTTS, a/k/a "Pep," and
NORMAN THOMAS,**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance,

a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1) (C) it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine.

COUNT 34

From a time unknown to the Grand Jury but believed to be as early as February 13, 2006 to on or about February 18, 2006, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy,"
CARLTON POTTS, a/k/a "Pep," and
RICKY BRINSON,**

did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons unknown to the Grand Jury to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1), all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(A), it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine, and that the amount containing a detectable amount of cocaine was at least 5 kilograms.

COUNT 35

On or about February 18, 2006, in Palm Beach County, in the Southern District of Florida, the defendants,

**WINFRED LORENZO HUNT, a/k/a "Big Dred," a/k/a "Fatboy,"
CARLTON POTTS, a/k/a "Pep," and
RICKY BRINSON,**

did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1) (C) it is further alleged that the controlled substance was in fact a mixture and substance containing a detectable amount of cocaine.

COUNT 36

On or about February 16, 2006, in Palm Beach County, in the Southern District of Florida, the defendant,

RICKIE ZEIGLER, JR, a/k/a "Man,"

having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm, and one or more rounds of ammunition in and affecting interstate commerce, that is, a Raven Arms Model MP-25 .25 caliber semi automatic pistol, and approximately four (4) rounds of Winchester manufactured .25 caliber ammunition, in violation of Title 18, United States Code, Sections 922(g)(1) and 924 (a)(2).

CRIMINAL FORFEITURE I

a. The allegations of Counts 1-35 of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which one or more of the defendants has an interest, pursuant to the provisions of Title 21, United States Code, Section 853(a).

b. Upon conviction of any of the offenses charged in Counts 1-35 defendants, Winfred Lorenzo Hunt, Carlton Potts, Leonard Allen, Jr., Dinesa Drigo, Anthony Green, Michael Drayton, Rickie Ziegler, Jr., Richard Small, Jeffery Potts, April Jackson, Levester Phillips, Henry McNish, Demetrius

McFadden, Kendrick Hughes, Dondrell Miller, Maurice Davis, Gregory Thelumsa, Chedrick Stone, Nicky Samuels, Jimmie Brinson, Ronald Gamble, Norman Thomas, and Ricky Brinson, shall forfeit to the United States all property, real and personal, involved in the afore stated offenses and all property traceable to such property.

c. If the property described above as being subject to forfeiture, as a result of any act or omission of the defendants, Winfred Lorenzo Hunt, Carlton Potts, Leonard Allen, Jr., Dinesa Drigo, Anthony Green, Michael Drayton, Rickie Ziegler, Jr, Richard Small, Jeffery Potts, April Jackson, Levester Phillips, Henry McNish, Demetrius McFadden, Kendrick Hughes, Dondrell Miller, Maurice Davis, Gregory Thelumsa, Chedrick Stone, Nicky Samuels, Jimmie Brinson, Ronald Gamble, Norman Thomas, and Ricky Brinson,

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

All pursuant to and Title 21, United States Code, Section 853.

CRIMINAL FORFEITURE II

Upon conviction of the violations alleged in Count 36, of this Superseding Indictment, the defendant, Ricky Zeigler, Jr., shall forfeit to the United States any firearm or ammunition involved in or used in said violation, including but not limited to the following:


- a. A Raven Arms Model MP-25 .25 caliber semi automatic pistol, and approximately four (4) rounds of Winchester manufactured .25 caliber ammunition.

Pursuant to Title 28, United States Code, section 2461, Title 18, United States Code, Section 924(d), and the procedures outlined at Title 21, United States Code, Section 853.

A TRUE BILL


FOREPERSON


R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY


KAREN L. ATKINSON
ASSISTANT UNITED STATES ATTORNEY